4659

CONFIDENTIAL PREDECISIONAL DOCUMENT

NPL PRIORITIZATION CRITERIA MEMO

Submitted To:	Philip Armstrong
Prepared By:	Maynard Geisler
Date:	September 8, 1994
Site:	Kustom Fit Hi-Tech Seating Products, Inc.
Site EPA ID Number:	CAD 983576190
Review and Concurrence:	Catherine C. Walton

The Contractor evaluated each of the following criteria to assist the U.S. Environmental Protection Agency (EPA) in determining if this site is appropriate for NPL consideration.

STATE AGENCY PRESENT AND FUTURE INVOLVEMENT

Currently, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), Region 3 (formerly known as the Department of Health Services, Toxic Substances Control Division) and the California Environmental Protection Agency, Regional Water Quality Control Board (RWQCB), Region 4 (formerly known as the California Regional Water Quality Control Board) have no historical or current involvement with the site.

OTHER REGULATORY INVOLVEMENT

Kustom Fit Hi-Tech Seating Products, Inc. operates onsite equipment under permits issued by the South Coast Air Quality Management District (SCAQMD), the County Sanitation District of Los Angeles County (CSDLA), and the City of South Gate Department of Public Works (DPW). The Kustom Fit Hi-Tech Seating Products, Inc. site is currently in compliance with these agencies' requirements.

Kustom Fit Hi-Tech Seating Products, Inc. has 11 permits, issued by the SCAQMD, to operate various types of equipment on site. The last inspection of Kustom Fit Hi-Tech Seating Products, Inc. by the SCAQMD was in April 1994. At that time, the SCAQMD issued a notification of noncompliance to Kustom Fit Hi-Tech Seating Products, Inc. for not properly posting SCAQMD permits and for failure to renew a SCAQMD permit to operate a drying oven on site. Those violations have since been corrected. The CSDLA permits wastewater discharges by Kustom Fit Hi-Tech Seating Products, Inc. to the sanitary sewer system. Kustom Fit Hi-Tech Seating Products, Inc. is currently in compliance with CSDLA permit requirements. The CSDLA permit requires that Kustom Fit Hi-Tech Seating Products, Inc. monitor its wastewater for pH, metals and organic compounds semiannually. In October 1993, the wastewater was found to contain 0.11 milligrams per liter (mg/l) zinc. In May 1994, the wastewater was found to contain 0.10 mg/l zinc. The CSDLA permit allows up to 1.48 mg/l zinc to be discharged to the sanitary sewer. No other compounds were detected during these reporting periods. The DPW permits Kustom Fit Hi-Tech

Seating Products, Inc. to discharge wastewater to the sanitary sewer system. The DPW is primarily concerned with the pH of the discharge water. In 1990, Kustom Fit Hi-Tech Seating Products, Inc. was cited for discharging wastewater with a pH of 5.5. Kustom Fit Hi-Tech Seating Products, Inc. is currently in compliance with the DPW requirements.

SITE OWNER/OPERATOR INVOLVEMENT

The site is owned by Earl and Janice Belk of Huntington Beach, Calif. and operated by Ronald Belk, President of Kustom Fit Hi-Tech Seating Products, Inc. In 1992, for undisclosed reasons, the site owners contracted with Dames & Moore to investigate onsite soils near the former truck service area. Tetrachloroethene (PCE) was detected at 6.3 micrograms per kilogram (µg/kg) at a depth of 0.5 feet below ground surface (bgs) and 1,1,1-trichloroethane was detected at up to 88 µg/kg at a maximum depth of 0.5 feet bgs. No other VOCs were detected in onsite soils. These results were not reported to any regulatory agencies. There are currently no plans by the site owner or operator to conduct additional subsurface investigations on site. The site is in compliance with SCAQMD, CSDLA, and DPW permit requirements. The financial status of Earl Belk, Janice Belk, or Ronald Belk are unknown.

COMMUNITY RELATIONS/INVOLVEMENT

There is no known community involvement regarding the site.

RELATION TO OTHER SITES

The Kustom Fit Hi-Tech Seating Products, Inc. site is not a subset of another site being investigated by the EPA or part of a proposed or listed NPL site.

OUTSTANDING HRS ISSUES

There appear to be outstanding HRS issues. The level of documentation available to support the HRS score indicates that the next appropriate step for the site is an ESI. The site scores a 50.00 based on a projected release of trichloroethylene (TCE) to groundwater, and projected Level I concentrations of TCE in groundwater at the City of South Gate drinking water well 7. Although TCE has been detected in groundwater from a downgradient drinking water well screened in the deep aquifers and not detected in groundwater from an upgradient drinking water well screened in the deep aquifers, insufficient data attributing the TCE contamination to the site requires that an observed release be projected at this time.

There is no documented use of TCE onsite and TCE has not been detected in onsite soils. Historically, Shellmar Products Corporation (a former occupant of the site) had three aboveground solvent tanks on site. The type of solvent(s) stored in these tanks is unknown. To establish the presence of TCE in onsite soils, soil samples should be collected from near the former truck service area and analyzed for volatile organic compounds (VOCs). Additionally, soil samples should be collected from the vicinity of the three former aboveground solvent tanks and analyzed for VOCs.

City of South Gate well 23 is located approximately 0.25 mile upgradient (south) of the site. Groundwater from this well was last sampled and analyzed using EPA Method 524.2 for VOCs in 1992. TCE was not detected at that time. City of South Gate well 7 is located approximately 0.25 mile downgradient (north) of the site and is screened from 500 feet to 600 feet bgs. In 1992,

groundwater from this well was sampled by the City of South Gate and analyzed for VOCs using EPA Method 524.2. TCE was detected at a concentration of 6.3 micrograms per liter (µg/l). The maximum contaminant level for TCE is 5.0 µg/l. Groundwater from City of South Gate wells 7 and 23 should be re-sampled and analyzed for VOCs to evaluate current groundwater conditions at these well locations.

Groundwater first occurs beneath the site in the Gaspur Aquifer. The Gaspur Aquifer extends from approximately 80 feet to 130 feet bgs. According to the HRS Guidance, the Gaspur Aquifer can be considered interconnected with deeper aquifers based on the presence of PCE in the City of South Gate drinking water supply well 23, located within 2 miles of the site, which is screened between 530 feet bgs and 798 feet bgs. If the site is to be considered a potential source of TCE contamination in the deeper aquifers, an observed release of TCE to the shallow, Gaspur Aquifer, should be established. There are currently no groundwater monitoring wells screened in the Gaspur Aquifer beneath the site. At least three monitoring wells, one upgradient and two downgradient, are needed to document the groundwater flow direction beneath the site and establish an observed release from the site to the Gaspur Aquifer. However, even if an observed release of TCE to the Gaspur Aquifer can be established, the presence of other potential source areas between the site and City of South Gate well 7 may require that additional monitoring wells be installed in the deeper aquifers to establish attribution of the TCE in City of South Gate well 7 to the site.